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Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR NO. 03-00141 DAE
)	
Plaintiff,)	GOVERNMENT'S DISCOVERY
)	STATEMENT AND NOTICE OF
vs.)	COMPLIANCE WITH CRIMINAL LOCAL
)	RULE 16.1(a); CERTIFICATE
DOUGLAS E. RYCHENER,)	OF SERVICE
)	
Defendant.)	
)	
)	

GOVERNMENT'S DISCOVERY STATEMENT AND
NOTICE OF COMPLIANCE WITH CRIMINAL LOCAL RULE 16.1(a)

The following discovery is either now available or forthcoming as to the above-indicated matter, pursuant to Federal Rule of Criminal Procedure 12 and 16 as well as Criminal Local Rule ("CrimLR") 16.1. In providing the discovery discussed herein, we follow the outline of CrimLR 16.1. All discovery materials that we consent to provide herein will be provided to

ORIGINAL

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

MAY 20 2003

at 8 o'clock and 35 min. p.m.
WALTER A. Y. H. CHINA, CLERK

CR 03-225

counsel on or near the date of the filing of this document.

1. Written/recorded statements. To best of knowledge, Defendant made no written or recorded statements.

2. Oral statements. Any other statements made by the defendant have been provided to the defense.

3. Grand Jury testimony. Upon information and belief, Defendant has not given any testimony before any federal grand jury in connection with the investigation of this case.

4. Prior convictions. The government has provided all available documentation of Defendant's criminal history.

5. Tangible objects, photographs, documents, etc.

The government has provided a copy of the investigation in this case. Any other tangible objects and documents material to the preparation of this case or intended for use as evidence in the government's case in chief at trial are available for inspection by the defense.

6. Test or Examination Results. Upon information and belief, all test or examination results in this case have been turned provided to defense.

7. Brady material. Any such material will be provided.

8. Lineups. Upon information and belief, no lineup or showup was conducted involving Defendant.

9. Search warrants. The search warrant executed on the defendant's residence was previously turned over to defense.

10. Electronic surveillance. Upon information and belief, no electronic surveillance or wiretap as defined in Title 18, United States Code, Section 2510, et seq. has been conducted in connection with the investigation of the charged offenses.

11. Similar Act Evidence. The government will give timely notice of its intent to enter evidence pursuant to Federal Rule of Evidence 404(b).

12. Other matters. We believe that this statement complies with our discovery obligations under the applicable rules. Government counsel will also readily entertain any specific requests for additional discovery as to matters which defense counsel may believe relevant, and, may wish to bring to the attention of government counsel. Otherwise, to the extent that counsel believes that Defendant is entitled to discovery materials which we have not consented to provide herein, counsel is advised to file the appropriate motion(s), so that the matter(s) can be resolved. In addition, pursuant to CrimLR 16.1(c) and Federal Rule of Criminal Procedure 16(c) the appropriate opposing party/attorney or the court will be promptly notified of the discovery, prior to or during trial, of

additional evidence or material subject to discovery or inspection under CrimLR Rule 16.1(a).

14. Defendant's Obligations. Finally, the United States hereby requests Defendant's compliance with Defendant's obligations under Rule 16 of the Federal Rules of Criminal Procedure and the Local Rules. Defendant is to consider the United States' request for discovery to be a continuing one pursuant to Federal Rule of Criminal Procedure 16 and the Local Rules. Also, pursuant to FRCrP Rule 12.1(a), the government also requests notice of an intent to utilize an alibi defense to any of the offenses in the above-referenced case. For purposes of the time, date, and place of the alleged violation(s), please refer to the reports.

DATED: May 20, 2003, at Honolulu, Hawaii.

EDWARD H. KUBO, JR.
United States Attorney
District of Hawaii

By



WES REBER PORTER
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document
was mailed to the following on May 20, 2003:

Assistant Federal Public Defender
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